RE: FY2020 EPA Brownfields Assessment Grant Application

R10-20-A-013

The Port Gamble S'Klallam Tribe (PGST) is pleased to submit this proposal for FY2020 Brownfields Community-Wide Assessment Grant funding. Below we provide the information requested.

### 1. Applicant Identification:

Port Gamble S'Klallam Tribe (PGST) 31912 Little Boston Road Northeast Kingston, Washington 98346

#### 2. Funding Requested:

(a) Assessment Grant Type: Community-Wide

(b) Federal Funds Requested:

(i) Requested Amount: \$300,000

(ii) Site-specific Assessment Grant Waiver: not applicable

(c) Contamination: \$225,000 Hazardous Substance and \$75,000 Petroleum

#### 3. Location:

(a) Port Gamble S'Klallam Tribe Reservation: Kingston, Washington.

(b) County: Kitsap

(c) State or Reservation: Washington

4. Property Information for Site-Specific Proposals: not applicable

#### 5. Contacts:

(a) Project Director:

Name: Paul McCollum, Director, Natural Resources Department at the PGST

Phone: (360) 297-6288 | Email: paulm@pgst.nsn.us

Mailing Address: 31912 Little Boston Road Northeast, Kingston, Washington 98346

(b) Chief Executive/Highest Ranking Elected Official:

Name: Jeromy Sullivan, Chairman

Phone: (360) 297-6243 | Email: jeromys@pgst.nsn.us

Mailing Address: 31912 Little Boston Road Northeast, Kingston, Washington 98346

6. Population: Port Gamble S'Klallam Tribe – 1,313 members

#### 7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	4
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1
The priority brownfield site(s) is impacted by mine-scarred land.	N.A.
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority brownfield site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	2
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	N.A.

**8. Letter from the State or Tribal Environmental Authority:** The PGST Natural Resources (NR) Department is the Tribal Environmental Authority and is the applicant for the EPA Brownfield Community-Wide Assessment Grant. This application serves as acknowledgement. A copy of the Tribal Council Resolution is attached

## **NARRATIVE PROPOSAL**

#### 1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

**1.a.i.** Background & Description of Target Area: The Port Gamble S'Klallam Tribe (PGST) is a federally recognized sovereign nation that occupies the 1,765-acre Port Gamble S'Klallam Indian Reservation ("Reservation") target area in Kitsap County, Washington. The Reservation is on the northern end of the Kitsap Peninsula, 20 miles NW of Seattle, in the heart of Puget Sound. The Reservation is bounded to the west by Port Gamble Bay or "Noo-Kayet", a 2.5-mile-long inlet of the Hood Canal that has served as critical ancestral subsistence grounds and an area of cultural significance to the S'Klallams for centuries.

The S'Klallams or "Strong People" are descendants of the Salish, who lived for thousands of years in the territory stretching from British Columbia to Oregon. S'Klallams occupied the shores of Puget Sound, adapting their lives to the natural bounty of the land, rivers and sea. Their first contact with Europeans occurred in 1799, when explorers seeking the legendary Northwest Passage arrived. Profound cultural changes ensued, as disease devastated the S'Klallams. By the time the Washington Territory was created in 1853, the S'Klallams had suffered mortality rates of up to 90%, and their population had dwindled to only 400. In 1853, William C. Talbot sailed into Puget Sound searching for a prime spot to log and mill trees to support the California Gold Rush. He found Port Gamble Bay, surrounded by lush forests of Douglas Fir and a shoreline where ships could easily load logs. Company agents encountered a village of S'Klallams at the Port Gamble Mill Site, eventually persuading them to move 1,900 ft across the water to Point Julia. The Pope & Talbot Timber Company founded the Port Gamble Mill and a regional land empire, while Tribal members struggled for survival. On a cold day in 1855, the S'Klallams signed away title to 438,430 acres of ancestral lands. It wasn't until the 1930s that PGST successfully petitioned to gain independent Tribal status, and Point Julia and the surrounding land was acquired to create the Reservation.

The Port Gamble Mill operated from 1853 to 1995. Today the mill is gone, however, legacy impacts from 142 years of wood product manufacturing remain within Port Gamble Bay, its shores and surrounding areas. Additionally, a plume from the Hansville Landfill, a shooting range, and unpermitted/illegal dump sites across the Reservation threaten Tribal health and diminish quality of life.

PGST's Natural Resources (NR) Department manages the Tribe's Environmental and Tribal Response Program (TRP), which serves to safeguard treaty rights and advocate for protection of natural and cultural resources from the increasing threats of pollution, loss of habitat, harmful land uses and other environmental issues. Over the past decade, PGST's TRP has been primarily funded by EPA Section 128(a) grants. While TRP funding significantly benefits the Tribe, the annual funds are insufficient to address the environmental site assessment (ESA) and cleanup needs of priority brownfields across the Reservation.

1.a.ii. Description of Priority Brownfield Site(s): TRP funding has been used to maintain a Brownfield Inventory of priority sites on and neighboring the Reservation. The Brownfield Inventory is updated as sites are remediated, new sites are identified and/or additional properties are targeted for acquisition.

<b>Brownfield</b>	Location	Historic/Current Use	Env. Concerns	**Reuse Plans	<b>Funding Needs</b>
Point Julia*	Shoreline at	Historic Tribal village from 1853-1930s. Currently a hatchery, ceremonial/ recreational area.	Impacted soils/ sediments. Petro, metals, dioxins/furans.	Restoration of culturally significant area; boat launch, fishing, beach	RAP/Reusé Plan.
The Bars*	Beach area north of Point Julia.	One of a few public beach access/recreational areas on Port Gamble Bay.	Impacted soils/ sediments. Petro, metals, dioxins/furans.	Shoreline Restoration; recreational area	Phase I/II ESA, ABCA, RAP /Reuse Plan.
Shooting Range	Northern backwoods, area.	Historic wooded/hunting area. Currently used as an shooting range/ dump.	Lead, heavy metals. Misc. haz and petro COCs from dumping.	Restoration of hunting grounds, streams & rec. area.	Phase I/II ESA, ABCA, RAP.
Car Dump Site*	Beach area south of Point Julia.	Important shoreline/ subsistence area. Used for illegal dumping.	Impacted soils/ sediments. Dumping. Petro, metals, dioxins/furans.	Shoreline restoration; recreational area	Phase I/II ESA, ABCA, RAP.
Multiple Dump Sites	South/central backwoods areas.	Historic wooded/hunting area. Currently used as illegal dumps.	Misc. hazardous substances and petro COCs from dumping.	**Admin Center, Warrior Ridge, Business Park & Heronswood Plans	Phase I/II ESA, ABCA, RAP.
Properties Targeted for Acquisition		Timber/Forestry Land	Misc. hazardous substances and petro from historic use.	Conservation and Timber Harvesting	Phase I/II ESAs to support acquisition.

cPAHs = carcinogenic polynuclear aromatic hydrocarbons; COCs = Contaminants of Concern; RAPs = Remedial Action Plans; Analysis of Brownfield Cleanup Alternatives (ABCA); \*Adjacent to water body/in FEMA Flood Plain; \*\*See Section 1.b.i.

As many of these areas are located near each other and are interconnected in terms of sources, COCs and reuse plans, PGST will employ a comprehensive strategy to assess brownfields across the Reservation.

Additionally, Reservation lands and the adjacent Port Gamble Bay have been heavily impacted by the former Port Gamble Mill, other industrial/marine activities, a neighboring landfill and nearby wrecking yard. As a result, Tribal members presently depend on impacted shellfish, fish and habitat for subsistence, ceremonial and commercial activities. Furthermore, affected Tribal members live on the Reservation and prolonged exposure to contaminants remains of great concern to the community. The following is a list of brownfields in the vicinity of the Reservation and a summary of major cleanup/restoration activities:

- Former Port Gamble Mill (1900' West of Reservation on Port Gamble Bay): Between 2002-2006 interim remedial actions were completed, which included offsite disposal of 26,310 tons of impacted soils. Plans for additional excavation, offsite disposal and capping are underway to address residual COCs, which include dioxins/furans, cPAHs, lead and arsenic. Although upland source areas are being addressed, offsite impacts to Port Gamble Bay, the western shores of the Reservation, and the potential that airborne disposition of COCs from historic boiler emissions have impacted Reservation lands remain a concern.
- Port Gamble Bay (Western Edge of Reservation): Studies in the early 1990s identified rising toxicity levels and their potential effect on human health, marine life, and water quality. In addition to surface water and sediment impacts, studies identified woody debris which created a toxic stew of petroleum and heavy metals as it degraded. Strict guidelines were subsequently issued for shellfish harvesting in Port Gamble Bay. Remedial activities were performed between 2015-2017, including dredging, treatment and off-site disposal of 70,000 cubic yards of sediment and wood waste, and removal of over 6,000 creosote pilings. Post-cleanup evaluations of impacts to shellfish and marine life are ongoing.
- <u>Former Hansville Landfill</u> (Adjacent to East/Central Area of Reservation): The headwaters of Reservation streams are located in the vicinity of the landfill, and a groundwater plume (COCs include vinyl chloride, 1,1-dichlorethane, and arsenic) extends to the backwoods areas near Reservation neighborhoods.
- <u>Old Wrecking Yard</u> (Northeast of Reservation): This site is located on private property next to the Reservation. There is concern that contamination from the wrecking yard could affect the Reservation. Although these brownfields are located off the Reservation, PGST continues to monitor potential risks to human health and the environment from these and other off-site sources. Wherever appropriate, these sites and their respective COCs may be considered Recognized Environmental Conditions (RECs) during Phase I/II ESAs completed on the Reservation as part of the EPA Brownfield Assessment Grant project.

  1.b.i. Reuse Strategy & Alignment with Revitalization Plans: PGST has invested significant resources to develop recent master plans to deliver additional community services, housing, economic development, improved subsistence grounds, and recreational amenities for Tribal members and area residents:
- <u>Administrative Center:</u> In 2014, PGST adopted the **Administrative Campus Master Plan**, which includes
  a new medical clinic, justice center, gym, offices, community center, public gathering spaces, and
  children's play area. This area is located within 300-ft of Port Gamble Bay (between Point Julia and the
  Car Dump Site) and may contain impacts from the former mill operations and past dumping activities.
- Housing and Income-Generating Master Plans: In 2018, PGST adopted three additional master plans:
- The 390-acre **Warrior Ridge Master Plan** addresses the local housing shortage and includes future Tribal member housing (301 lot assignments, 58 rental units, and 11 elder housing units), recreation, ceremonial space, commercial services and multi-modal transit options for Tribal members. The plan includes a new north-south roadway connection (Strong Blvd.) that will interconnect Reservation properties and provide additional emergency access. Future housing will connect to centralized utilities to eliminate the need for private wells and septic tanks. A portion of this area presently has evidence of illegal dumping and other potential RECs that threaten natural areas and redevelopment plans.
- The 80-acre Business Park is the Tribe's primary income-generating property with the Point Casino, hotel and Gliding Eagle convenience store. These business operations are the most significant revenue sources to fund member services and future Tribal housing. The Business Park Master Plan includes design and development strategies for expansion of the casino, commercial enterprises, Tribal social services, Wastewater Treatment Plant (WWTP), and solar energy production. Historic land use includes past commercial operations, and the property is located near the former Hansville Landfill. The Tribe will use funding to complete a Phase II/ESA in support of critical economic development opportunities.
- The 15-acre **Heronswood Master Plan** outlines a restoration plan for a recently acquired historical botanical garden as a Tribal gathering place and income-generating tourist destination. The Plan

- includes rare/sacred plant species, an education center and reception hall. Heronswood will provide supplemental income from entrance fees and facility rentals. Phase I/II ESAs will help identify potential environmental issues from historic land uses and guide the Tribe's restoration/redevelopment strategy.
- <u>Shoreline/Habitat Restoration</u>: Point Julia, the Bars, other shoreline areas on Port Gamble Bay and the backwoods areas of the Reservation are sacred Tribal gathering spaces and important subsistence grounds for fishing, shellfish harvesting, hunting and recreation. The Tribe will utilize EPA funding to refine cleanup/restoration plans for these areas that address public health and environmental concerns. Although PGST has developed conceptual plans for amenities that include new docks and boat launches, supplemental Phase II ESA activities and RAPs are required to further evaluate soil/sediment impacts before making additional investments to complete the planned improvements.
  1.b.ii. Outcomes & Benefits of Reuse Strategy: EPA funding will address environmental concerns and inform plans and strategies for the Administrative Campus, Warrior Ridge, Business Park, Heronswood & Shoreline/Habitat Restoration projects described above. Outcomes/benefits of these projects include:
- Economic Benefits: These projects are anticipated to create significant jobs<sup>a</sup> and revenue generation:

   <u>Business Park Expansion</u>: Plans include a 175,000-sf casino, 89,000-sf of hotel, 29,600-sf of office, 53,500-sf of retail, and 168,000-sf of manufacturing. These developments are anticipated to create 348 jobs from retail, entertainment, lodging, office and manufacturing activities and would generate approx. \$190,816 in annual lease revenue from non-Tribal business enterprises at the Business Park.
- <u>Heronswood Garden</u>: Creation of 13,000-sf of event services and 10,630-sf of office/operations is anticipated to generate 21 jobs and new revenue from entrance fees and facility rentals.
- <u>Warrior Ridge</u>: Creation of 116,958-sf of commercial and 10,000-sf of assisted living is anticipated to generate 92 jobs from retail/sales and elder care activities and would generate \$233,916 in annual revenue from non-Tribal commercial business leases on the Warrior Ridge property.
- <u>Administrative Campus:</u> 64,000-sf of office space to provide 112 additional Tribal positions. **Non-Economic Benefits**: The Tribe will leverage the economic benefits described above to help fund solutions to address its immediate and anticipated future needs for quality affordable housing, social services, restoration of shoreline/habitat, and creation of trails and greenspace, including the following:
- <u>Housing Solutions</u>: As detailed above, the plans for Warrior Ridge include 370 additional housing units. This will allow additional Tribal members to move to the Reservation, address current household overcrowding, provide affordable rental options, and create an assisted living resource for elders.
- <u>Food Source/Ceremony</u>: Restoration of subsistence areas along Port Gamble Bay and traditional hunting grounds in backwoods areas will provide increased/healthier food sources for Tribal families, commercial income opportunities and a healthier environment for ceremonial and recreational events.
- Social Services: Expanded social services at Admin Campus and a Wellness Center at the Business Park.
- <u>Shoreline/Habitat Restoration, Trails and Greenspace:</u> The project is anticipated to result in the restoration of up to 1,500 feet of shoreline and five acres of forest habitat. Additionally, the projects involve creation of five miles of new trails and 120.4 acres of new parks and recreational areas.

Federally-Designated Opportunity Zones (DOZs): Although the Reservation itself is not located in a DOZ, PGST's treaty rights extend throughout their usual and accustomed ancestral grounds, a territory which includes much of the Kitsap Peninsula and the northern shoreline areas of the entire Olympic Peninsula. This region includes many DOZs that may benefit from ongoing restoration activities, most notably: Indian/Marrowstone Islands (CT 9504), Port Townsend (CT 9504, 9506) and Port Angeles (CTs 7, 8, 9, 15).

1.c.i. Resources Needed for Site Reuse: PGST has a proven track-record of leveraging multiple resources to achieve restoration and/or redevelopment goals. For example, during 2010-2012 PGST used previous EPA funding to complete Phase I/II ESAs and an Analysis of Brownfield Cleanup Alternatives (ABCAs) for the Point Julia site. These activities identified several environmental impacts, including dumping/debris piles, soil and sediment impacts. During 2015-2018, PGST coordinated with Tribal members and other local volunteers to implement shoreline debris removal/beach cleanup activities. In order to remove larger debris, including a derelict vessel, heavier construction materials and wooden pilings, PGST secured and implemented a 2018 Debris Removal Grant from the Washington Department of Ecology. Similarly, PGST anticipates leveraging EPA funding with the following state/federal grants & Tribal resources:

<sup>&</sup>lt;sup>a</sup> Based on U.S. Energy Information Administration's 2016 employment estimates for amounts (sf)/type (office, retail, entertainment, manufacturing, etc.) of anticipated improvements.

- <u>Income-Generating Properties</u>: PGST will develop the Business Park, Warrior Ridge and Heronswood areas with commercial services, tourist attractions, rental space and third-party lease agreements. These properties will provide revenue to fund cleanup and improvements on other priority brownfields.
- <u>Assessment/Cleanup Resources</u>: PGST will pursue Washington State (Ecology/Commerce) grants, use
  commercial revenues, and Tribal general funds to complete assessment/cleanup activities at priority
  brownfields. NR will provide in-kind management and planning services, and the Tribe will continue to
  rely on volunteers for shoreline and forest dump/debris cleanup activities. PGST is also familiar with
  pursuing claims from historic insurance policies & viable responsible parties to fund restoration efforts.
- <u>Housing Grants:</u> The Housing Authority will continue to utilize HUD funding to finance redevelopment projects across the Reservation including portions of Warrior Ridge and supporting infrastructure.

**1.c.ii. Use of Existing Infrastructure:** Priority brownfields are connected to existing infrastructure. Additionally, the project will leverage the following recent and/or planned infrastructure improvements:

Infrastructure	Major Infrastructure Improvements Description(s)	Status		
Wastewater	PGST constructed a WWTP with excess capacity for 668 equivalent			
Treatment Plant	residential units (ERU). This capacity is enough to cover development plans	Complete		
(WWTP)	for the Administrative Campus, Business Park and Warrior Ridge.			
Point Julia	Point Julia has two existing boat launches that are in need of repair. PGST	Planned		
Dock/Boat Ramp		riailileu		
Strong Boulevard	A new north-south internal roadway (Strong Bvd.) to interconnect future			
Strong boulevaru	housing with the Business Park. Strong Blvd. will parallel Hansville Rd.	Planned		
Business Park	The Business park has two existing water towers that provide fire			
Water Towers	suppression to service the Reservation and future expansion plans.	Complete		
Water Lines	Kitsap County is the service provider and existing service lines are in place.	Complete		
Fish Hatchery	An existing fish hatchery at Point Julia to ensure a sustainable fish source.	Complete		
Administrative	The Campus has existing utilities, parking, and roadways to serve planned	Complete		
Campus	building expansions as outlined in their 2014 Master Plan.	Complete		

#### 2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

**2.a.i.** The Community's Need for Funding: With just over 1,300 enrolled Tribal members, PGST has limited ability to draw upon other sources of funding to complete assessment/cleanup activities. PGST does not levee taxes and instead relies on income from Tribal enterprises and external grant funding to maintain services and position the Tribe for a successful future. Furthermore, PGST includes many of the region's most economically distressed residents. Tribal members are particularly disadvantaged, suffering high rates of unemployment and households receiving government assistance (1.5-3X higher than state/national averages), and per capita incomes are less than half of Kitsap County averages.

Data Type	Reservationb	Kitsap County	Washington	United States
5-year Unemployment Rate	18.4%	9.6%	9.4%	9.7%
Per Capita Income	\$15,627	\$31,769	\$30,742	\$28,155
Households receiving Social Security Income	14%	5%	4.4%	4.9%
Households receiving Food Stamp/SNAP Benefits	32.5%	11.9%	13.6%	12.4%
Minority Population <sup>c</sup> / % American Indian	86.2% / 67.3%	21.5% / <b>1.2%</b>	28.1% / <b>1.2%</b>	36.7% / 0.7%
Median Home Value	\$107,000	\$268,200	\$262,100	\$176,700
High School Graduate (age 25+ years)	81%	93.6%	90%	86%
Bachelor's Degree or Higher (age 25+ years)	12.1%	29.5%	31.9%	28.8%
Vacant Housing Units	4.8%	9.3%	9.3%	12.5%
Average household size	3.80	2.51	2.54	2.63

**Bold/shaded** indicates factors above or below (depending on factor) the national/state averages, respectively.

Major employers for PGST members include: Tribal government; Tribal enterprises, including aquaculture, retail outlets, a small casino and event center, the Business Park, a construction company, and property management; individual treaty fishing enterprises; and other area businesses. Many of the employment opportunities are seasonal, and as such, adult unemployment rates often increase to more

<sup>&</sup>lt;sup>b</sup> Census data provided reflects the Reservation population and does not reflect Tribal enrollment.

<sup>&</sup>lt;sup>c</sup> Calculated by subtracting the reported % of "total white persons not Hispanic" from 100%.

than 50% during the winter months. Restoration and redevelopment of priority brownfields on the Reservation will provide much needed employment opportunities and critical affordable quality housing. **2.a.ii. Threats to Sensitive Populations:** (1) Health or Welfare of Sensitive Populations:

As noted in Section 2.a.i., PGST includes some of the highest concentrations of sensitive (low income/minority) populations in the area. Additionally, as shown in the table, EPA's Environmental Justice Screening (EJSCREEN) Tool reports that the Reservation ranges between the 82<sup>nd</sup> to 89<sup>th</sup> percentile for overall demographic index,

Sensitive Population	%tile in WA
Demographic Index	89
Minority Population	89
Low Income	82

minority and low incomes as compared to Washington State as a whole.<sup>d</sup> Major Tribal welfare concerns include lack of quality affordable housing and employment. As indicated in Section 2.a.i, the available housing rate is less than half, while the average household size is 1.5X state/national averages. In 2018, the housing waitlist was 142 households long, and a recent survey indicated that 1 in 3 PGST households had one or more temporary residents. e Housing insecurity and crowding during childhood is associated with lower academic achievement. As indicated in Section 2.a.i., the percentage of individuals receiving a high school diploma is less than the state/national averages, and the percentage of individuals receiving a college degree is even lower. Grant funding will help expedite development of the Warrior Ridge project, which is anticipated to deliver 370 much needed housing units. Additional housing will provide a foundation for a brighter future for PGST's youth. Brownfield redevelopment will also promote significant economic relief with short-term (e.g., Tribal construction jobs) and long-term employment opportunities as part of the Business Park expansion and restoration of Heronswood. Furthermore, when the former Port Gamble Mill polluted Port Gamble Bay, PGST's ability to harvest food for subsistence and commercial purposes was severely diminished. Contamination of critical food sources has led to several health concerns, including increased risk of cancer, reproductive and developmental effects, and kidney damage from exposure to heavy metals and dioxins. Phase I/II ESAs & restoration of shoreline/forest habitat will help PGST better understand current conditions & address potential threats to Tribal member health.

(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Kitsap County has the fourth highest rates of overall cancer<sup>f</sup> and incidences of asthma among adults<sup>g</sup>, third highest incidence of asthma-related hospitalizations and one of the highest asthma rates among youth in Washington. Inhalation of airborne particulates [Section 2.a.ii.(3)] are associated with increased asthma prevalence, and an overburdening of exposure weakens immunity & leads to chronic disease (including lung cancer). The life expectancy for Native Americans in Washington State is almost 8.6 years less than that of non-Hispanic whites (71.4 years vs 80 years). Environmental contamination is one of the key risk factors that ranks higher for PGST Tribal members than the general population. PGST receives physical and cultural sustenance from the fish and shellfish harvested from Port Gamble Bay. The higher consumption rate for locally harvested shellfish by Tribal members results in greater exposure to unsafe contamination. Additionally, fear of engaging in traditional activities such as fishing and canoeing impacts cultural connections to the environment, discourages outdoor physical activity, and negatively impacts mental health. The Washington State Dept. of Health (DOH) conducted a Public Health Assessment of shellfish from Port Gamble Bay using subsistence consumption rates derived from a survey of Tribal members. The study found that heavy metals, dioxins and carcinogenic PAHs (cPAHs) are present in Port Gamble Bay sediments and shellfish tissues at levels of concern<sup>j</sup>. The primary recommendations of the DOH report included harvesting from a variety of areas, following guidelines provided for eliminating some contaminated portions of shellfish from prepared meals, and eating smaller shellfish portions. Not only do these recommendations amount to advising PGST to give up a culturally important and healthy source of protein, but the results and conclusions presented in the report are inadequate to reduce the uncertainty among Tribal members associated with harvesting shellfish from the Bay. Grant funding will enable PGST to complete evaluations and eliminate uncertainty.

<sup>&</sup>lt;sup>d</sup> EJScreen Report (Generated on October 29, 2019).

e Port Gamble S'Klallam Tribal Survey, Summary of Data (July 2017).

f According to www.statecancerprofiles.cancer.gov.

g WA Dept. of Health. The Burden of Asthma in Washington State, 2013 Update

<sup>&</sup>lt;sup>h</sup> University of Wisconsin, Population Health Institute. 2015 County Health Rankings, Washington.

Disparities in Life Expectancy of Pacific Northwest American Indians and Alaska Natives; Dankovchik et al. 2015; p. 130 (1): 71-80.

Exposures from Shellfish & Sediments in Port Gamble Bay, Washington State Department of Health (DOH), March 27, 2015.

(3) Disproportionately Impacted Populations: PGSTs cultural, financial, and subsistence connection to

the local environment make them more vulnerable to local contamination than populations who are more mobile. As shown in the table of "Environmental Justice Indicators" (EJI), produced using EPA's EJSCREEN Tool, the Reservation ranges between the 80<sup>th</sup> to 83<sup>rd</sup> percentile for disproportionate burden and vulnerability to exposure to air quality and other contaminant sources as compared to Washington State as a whole. With PGST's strong cultural connection to

Туре	Environmental Justice Indicators (EJI)	%tile in WA
	Particulate Matter (PM 2.5)	81
Air Quality	Ozone	82
	Diesel Particulate Matter	80
	Air Toxics Cancer Risk	80
Hazardous	Lead Paint	83
Substances	Superfund Proximity	80

Port Gamble Bay, the environmental conditions reflected in the EJI factors are felt by every Tribal member. As described in Section 2.a.ii.(2), the Washington State DOH has indicated that sediment, shellfish and other species in Port Gamble Bay have elevated concentrations of contaminants. Such reports have discouraged engagement in ceremonial and subsistence activities on the Bay, eroding community ties and traditions. Grant funding will enable PGST to accurately document current conditions, clean up source areas, and develop sustainable practices that strengthen Tribal connections to the outdoor environment. Another example of a concrete impact that assessment, cleanup, and sustainable development on the Reservation can have is air quality improvement through reduction in vehicle emissions. Adding quality housing, trails, transit and employment options on the Reservation will reduce vehicle impacts, as well as threats associated with exposure to lead paint in aging housing stock. 2.b. Community Engagement. 2.b.i. Project Partners /2.b.ii Roles: The EPA Brownfield Grant project will be managed by PGST's Natural Resources (NR) Department as an extension of the Environmental and Tribal Response (TRP) Programs. To ensure the project is a success, NR staff will engage with other Tribal stakeholders throughout the entire implementation process, including: (i) Brownfield Inventory, Prioritization & Site Selection; (ii) Phase I/II ESAs; and (iii) Cleanup/Reuse Planning activities. NR will form a dedicated Brownfield Advisory Committee (BAC) to administer the grant in a coordinated effort that is inclusive of the full spectrum of Tribal interests, including key staff from each of the following partners:

- Noo-Kayet Development Corporation: Manages the Business Park & economic development interests.
- Planning Department: Manages master planning, land use, construction and utility improvements.
- Housing Authority: Manages efforts to provide quality affordable housing for all Tribal members.
- Heronswood Garden: Manages operations and restoration efforts on the Heronswood property.
- *PGST Foundation*: A non-profit entity that promotes cultural heritage, education and wellness initiatives.
- PGST Executive Director: Oversees operations and investments and reports directly to the Tribal Council.
- <u>Health Services</u>: Manages the Health Clinic & efforts to improve the health & welfare of Tribal members. In addition to serving on the BAC, each project partner has committed to supporting outreach activities.

Partner Name	Contact Person; Email; Phone #	Specific Role in the Project
Noo-Kayet	Chris Placentia, CEO; cplacentia@	Assist with site selection, Phase I/II ESAs, and cleanup/reuse plans for the
Development Corp	pgst.nsn.us; 360.297.7414.	Business Park and other priority economic development initiatives.
Port Gamble Housing	Craig Dougall; cdougall@pgst.nsn.us;	Assist with site selection, Phase I/II ESAs and cleanup/reuse plans for the
Authority	360.297-2646.	Warrior Ridge property and other housing related initiatives.
Planning	Joe Sparr, Director; jsparr@	Assist with engagement/outreach efforts and ensure cleanup/reuse plans
Department	pgst.nsn.us; 360.297.6354.	are consistent with Tribal land use policies, goals and objectives.
Heronswood Garden	Dan Hinkley, Director; dhinkley@	Assist with site selection, Phase II ESA and restoration/redevelopment plans
	pgst.nsn.us; 360.297.9620.	for the Heronswood Garden property.
Port Gamble	Joan Garrow, Executive Director:	The Foundation provides funding and other resources to support activities in
S'Klallam Foundation	jgarrow@pgst.nsn.us; 360.297.9620.	alignment with their mission to improve the quality of life of Tribal members.
PGST Executive	Kelly Sullivan; sullyk@pgst.nsn.us;	Manage staff and inform decision-making processes. Ensure compliance
Director	360.297-6259.	with Tribal policies and communicate progress to Tribal Council.
Health Services	Kerstin Powell; kerstin@	Provide health/welfare data and assist with ongoing health monitoring and
Administration	pgst.nsn.us; 360.297.9649.	risk assessment activities. Represent health and welfare interests.

**2.b.iii.** Incorporating Community Input: PGST believes that effective community engagement is imperative to the success of this project. During the first quarter (1Q), NR staff will work closely with its project partners to develop a Community Involvement Plan (CIP). The CIP will leverage PGST's existing channels of communication to ensure meaningful input is infused into all grant implementation activities.

<u>Press Releases, Fact Sheets and Project Webpage</u>: During 1Q, PGST will develop press releases, fact sheets & other materials to inform the Tribal community about the project. These documents will be available via PGST's existing brownfields webpage, which is operated/maintained on the NR website.

<u>Social Media/Email</u>: PGST's dedicated outreach division takes pride in ensuring that Tribal members feel included in decision-making. With a following of over 2,600 members on Facebook, PGST emphasizes outreach through social media to engage younger audiences. Additionally, each Tribal member is assigned a PGST email account and the Tribe regularly distributes public notices via email. The NR Department will use PGST's Facebook account and email list to solicit input into community priorities.

<u>Newsletters</u>: PGST distributes a weekly newsletter to all Tribal members. The NR Department will publish articles in the newsletter about the project, cleanup/reuse activities and engagement events.

<u>Public Open Houses:</u> PGST will host 2-3 public open houses over the course of the project to solicit input from Tribal Members regarding site prioritization and cleanup/reuse planning activities.

<u>Tribal Surveys</u>: During recent master planning activities for the Business Park, Warrior Ridge and Heronswood, PGST utilized surveys to solicit Tribal member input to inform redevelopment plans. Tribal members expressed a desire to complete assessment/cleanup activities to support redevelopment.

Other Events & Strategies: Tactical events, such as pop-up stations at the Wellness Center, Elders Center, Youth Center, or playgrounds, will be tools that PGST can use to capture full-time, busy parents and Tribal youth alike. For example, in November 2019, PGST hosted a pop-up event at the Tribal Center to share information about the EPA Grant project, verify community priorities, and discuss opportunities for Tribal members to get involved. Participants expressed their desire to prioritize Point Julia & the Bars to ensure safe food sources and recreation. Five Tribal members signed up to serve on the BAC. During the 3-year period, PGST will continually engage members at Tribal meetings, community potlucks and other events.

This menu of engagement/input methods will allow Tribal members to provide informed feedback over the course of the project that can influence the next phase of work. Strong public involvement with those most affected by brownfields will lead to community buy-in and more effective restoration plans.

#### 3. TASK DESCRIPTION, COST ESTIMATES & MEASURING PROGRESS:

<u>3.a. Description of Tasks (i. Implementation Activities; ii. Schedule; iii. Leads; and iv. Outputs)</u>: The scope of work has been organized into the **five** primary tasks described in this section.

#### Task 1: Cooperative Agreement (CA) Management, Reporting & Other Eligible Activities

- i. <u>Implementation</u>: PGST will manage all aspects of the project, including coordination with the EPA, Qualified Environmental Professional ("QEP" or "Consultant"), and other key stakeholders. Reporting will include: 1) Quarterly Progress Reports (QPRs); 2) Property Profiles/ACRES Updates; 3) Annual/Final Disadvantaged Business Enterprise (DBE) and Federal Financial Reports (FFRs); and 4) a Final Performance Report documenting accomplishments, expenditures, outputs/outcomes, and success stories. PGST will attend two brownfield conferences over the 3-year grant implementation period.
- ii. <u>Schedule</u>: Management/Reporting will be ongoing throughout the 3-year implementation period. A State/Regional Workshop and National Brownfield Conference is anticipated in 2021-2.
- iii. Leads: PGST will lead this task. The Consultant will assist with reporting activities.
- iv. <u>Outputs</u>: Agendas/minutes from stakeholder meetings; 12 QPRs; 3 DBE/FFR Reports; ACRES Updates (ongoing); 1 Final Report; 2 Brownfield Conferences attended by PGST staff.

## **Task 2: Community Engagement**

- i. <u>Implementation</u>: A description of plans to engage the PGST community in the project is provided in Section 2.b., including: 1) Community Involvement Plan (CIP); 2) fact sheets & press releases; 3) project webpage; 4) up to 8 Brownfield Advisory Committee meetings (BAC); & 5) other stakeholder meetings.
- ii. <u>Schedule</u>: The CIP, fact sheets and webpage will be developed during the first quarter (1Q) of the project. A BAC kick-off meeting will be held during the second quarter (2Q) and convened quarterly for the first year, and semi-annually thereafter; other stakeholder meetings will occur as needed.
- iii. Leads: PGST will lead this task, with support from the BAC and Consultant.
- iv. <u>Outputs</u>: CIP; fact sheets; press releases/articles; webpage content (updated regularly); 8 BAC Meetings (including presentations, agendas, minutes, etc.); other stakeholder meetings/materials.

### Task 3: Inventory, Prioritization and Site Selection

- i. <u>Implementation</u>: The Brownfield Inventory will be enhanced and maintained for the entire Reservation and properties targeted for acquisition by PGST. The inventory will include acquiring/incorporating data to better document historic land use, current site conditions and ongoing assessment/cleanup activities. The inventory will be linked to geographic information systems (GIS) to maximize its value as a planning tool. PGST will establish criteria to select sites & activities that offer the greatest socioeconomic benefits.
- ii. <u>Schedule</u>: The draft inventory will be completed during 2Q and presented to the BAC for prioritization during 3Q. Inventory updates and site selection will continue over the 3-year period.
- iii. Lead: PGST will lead this task, with support from the BAC and Consultant.
- iv. Outputs: Inventory, Prioritization & Site Selection Tech Memos; GIS files; tables; figures.

#### Task 4: Phase I/II Environmental Site Assessments (ESAs)

- i. <u>Implementation</u>: Includes completion of up to five Phase I ESAs (in accordance with the AAI Final Rule and ASTM E1527-13 Standard) and up to five Phase II ESAs on the priority sites identified in Section 1.a.ii. This task also includes preparation of: 1) site eligibility determination (ED) forms; 2) access agreements (if needed); 3) an EPA-approved Master Quality Assurance Project Plan (QAPP) prior to assessment activities; 4) EPA-approved Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) prior to performance of Phase II ESAs; and 5) completion of National Historic Preservation Action (NHPA) §106 and Endangered Species Act §7(a)(2) requirements to ensure assessments will have no adverse effects.
- ii. <u>Schedule</u>: **Year 1**: Master QAPP, 2 Phase I ESAs & 2 Phase II ESAs. | **Year 2**: 2 Phase I ESAs & 2 Phase II ESAs. | **Year 3**: 1 Phase I ESA & 1 Phase II ESA.
- iii. Lead: The QEP will lead this task under the direction of PGST.
- iv. Outputs: 1 Master QAPP; ~10 Site ED Forms; 5 Phase I ESAs; 5 Phase II ESAs.

## Task 5: Cleanup/Reuse Planning

- i. <u>Implementation</u>: Analysis of Brownfield Cleanup Alternatives (ABCAs), Remedial Action Plans (RAPs) and/or Reuse Plans will be completed for up to four sites to inform cleanup and/or reuse plans/strategies.
- ii. Schedule: Year 1: 1 RAP/Reuse Plan | Year 2: 2 RAPs/Reuse Plans | Year 3: 1 RAP/Reuse Plan
- iii. Lead: The QEP will lead the technical elements of this task under the direction of PGST.
- iv. Outputs: 4 ABCAs/RAPs/Reuse Plans.
- <u>3.b. Cost Estimates</u>: A budget summary is provided in the table below. >50% of the funding is allocated towards Phase I/II ESAs. No indirect, health monitoring, personnel + fringe or supply costs are requested.

#		Task 1	Task 2	Task 3	Task 4	Task 5	
Line	Budget Categories	Management & Reporting	Community Engagement	Inventory, & Site Selection	Phase I/II ESAs	Cleanup/Reuse Planning	Totals
1	Personnel + Fringe (Petro)	\$0	\$0	\$0	\$0	\$0	\$0
2	Travel (Petro)	\$1,000	\$0	\$0	\$0	\$0	\$1,000
3	Supplies (Petro)	\$0	\$0	\$0	\$0	\$0	\$0
4	Contractual (Petro)	\$3,000	\$4,000	\$5,000	\$47,000	\$15,000	\$74,000
5	Total Direct Costs (Petro)	\$4,000	\$4,000	\$5,000	\$47,000	\$15,000	\$75,000
6	Personnel + Fringe (Haz)	\$0	\$0	\$0	\$0	\$0	\$0
7	Travel (Haz)	\$3,000		\$0	\$0	\$0	\$3,000
8	Supplies (Haz)	\$0	\$0	\$0	\$0	\$0	\$0
9	Contractual (Haz)	\$9,000	\$12,000	\$15,000	\$141,000	\$45,000	\$222,000
10	Total Direct Costs (Haz)	\$12,000	\$12,000	\$15,000	\$141,000	\$45,000	\$225,000
11	Total Budget (Combined)	\$16,000	\$16,000	\$20,000	\$188,000	\$60,000	\$300,000

CA = cooperative agreement; ESA = Environmental Site Assessment; RBM = Regulated Building Material; Haz = Hazardous;; Petro = Petroleum The following tables provide a summary of the estimated costs for project outputs by task and budget category.

#### Task 1 – CA Management, Reporting & Other Eligible Activities: Total Budget = \$16,000

<u>Travel Costs</u> of **\$4,000** are budgeted for expenses for two PGST members to each attend 2 BF conferences. Costs are est. at \$1,000/person/conference based on recent conference costs. <u>Contractual Costs</u> of **\$12,000** are budgeted (96 hrs @ \$125/hr) of work by the QEP to assist with reporting activities.

Haz vs Petro: For all Task 1 activities, 25% of costs will be allocated to petroleum and 75% to haz. funding.

## Task 2 – Community Engagement: Total Budget = \$16,000

Contractual Costs of \$12,000 are budgeted (128 hrs @ \$125/hr) for assisting with all outreach activities. Haz vs Petro: For all Task 2 activities, 25% of costs will be allocated to petroleum and 75% to haz. funding.

#### Task 3 – Inventory, Prioritization & Site Selection: Total Budget = \$20,000

Contractual Costs of \$20,000 are budgeted, including \$2,000 to acquire historical, regulatory database and current site data and \$18,000 for an est. 144 hrs (@ \$125/hr) of work for enhancing the inventory.

Haz vs Petro: For all Task 3 activities, 25% of costs will be allocated to petroleum and 75% to haz. funding.

## Task 4 - Phase I and II ESAs: Total Budget = \$188,000

Contractual Costs of \$188,800 include costs for the QEP to complete 1 Master QAPP (\$8,000); 10 ED forms (\$500 each = \$5,000); 5 Phase I ESAs (\$5,000 each = \$25,000); 5 Phase II ESAs (\$30,000 each = \$150,000).

**Haz vs Petro:** Costs will be allocated based on the approved site eligibility (petroleum and/or hazardous) for each site. Assumes 25% of the overall task budget will be allocated to petro. sites and 75% to haz. sites.

## Task 5 – Cleanup/Reuse Plans: Total Budget = \$60,000

Contractual Costs of \$60,000 are estimated based on the QEP completing 4 Analysis of Brownfield Cleanup Alternatives (ABCAs)/Remedial Action Plans (RAPs)/Reuse Plans at an avg. cost of \$15,000/site.

Haz vs Petro: 1 RAP/ABCA/Site Reuse Plan for a petro site & 3 RAPs/ABCAs/Reuse Plans for haz sites.

**3.c. Measuring Environmental Results**: The status of outputs and anticipated short- and long-term outcomes will be tracked and reported to EPA via Quarterly Progress Reports (QPRs), ACRES and the Final Performance Report. QPRs will list goals accomplished and activities planned for the next quarter. Any significant deviations in schedule will be discussed with the EPA Project Officer to develop corrective actions. Between meetings and QPRs outputs will be tracked in a database including: (1) # of potential brownfields identified; (2) # of Phase I ESAs; (3) # of Phase II ESAs; (4) # of Analysis of Brownfield Cleanup Alternatives (ABCAs) and/or Remedial Action Plans (RAPs); and (5) # of community meetings and success stories. Sites assessed will be linked to parcel data, to enable the number of parcels and acreage to be accurately tracked. The following short- and long-term outcomes will be tracked: (1) # of sites cleaned up; (2) # of property title transfers; (3) # of sites and acres of land redeveloped; (4) # of acres of greenspace created; (5) \$ of private investment and leveraged funding; (6) # of jobs created or retained; and (7) increased property value and tax revenue. To ensure completion within the 3-year period, PGST will refine the schedule/milestones as part of the Cooperative Agreement (CA) Work Plan. PGST will also update ACRES beyond the project end date to ensure outcomes are captured as sites are restored/redeveloped.

#### 4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a.i. Organizational Structure: The EPA Brownfield Grant will be managed by PGST's Natural Resources (NR) Department as an addition to the Tribe's Environmental and Tribal Response (TRP) Programs. These programs are designed to protect and enhance the natural treaty resources available to Tribal members and future generations. There are several brownfield sites on and neighboring the Reservation which threaten PGST's land, treaty rights and culture which the Tribe is committed to assessing and cleaning up to support restoration and/or redevelopment plans and strategies. NR staff play an intricate role in brownfields through managing the Brownfield Inventory and oversight of assessment and cleanup activities on the Reservation. NR staff are also actively engaged in collaborating with local stakeholders and state agencies on ongoing cleanups at the former Port Gamble Mill and Port Gamble Bay. Additionally, NR staff work closely with other Tribal Departments and staff to address health and welfare concerns, conduct outreach to increase education about environmental issues, and prevent future brownfields from being created. The NR Department will leverage its extensive restoration and brownfield grant/funding experience to ensure this project is a success, which includes successfully implementing FY2009 EPA CWA Grants and \$1.2 million of EPA 128(a) TRP funding since 2008.

4.a.ii. Description of Key Staff: PGST staff have extensive experience managing brownfield grant projects:
 Paul McCollum, NR Director: With 12+ years of experience as PGST's NR Director, Paul will serve as the Brownfield Grant Director. Paul is responsible for carrying out the mission of PGST's Environmental Program and TRP. This includes collaborating with Tribal entities, local stakeholders, and state/federal agencies on complex restoration projects, such as the ongoing cleanup of Port Gamble Mill/Bay. Paul

- previously served as the Director of PGST's FY2009 EPA CWA Grant, and his experience will ensure effective expenditure of funds while maintaining a strong focus on PGST's restoration goals.
- <u>Joshua Carter, TRP Manager</u>: As part of his role as TRP Manager, **Josh will serve as the Brownfield Grant Manager**. He holds a Master's in Env. Studies from Evergreen, and has a background in monitoring, sampling, and wetland mitigation. Since assuming the role of TRP Manager, Josh has enhanced the Brownfield Inventory and served as the technical lead on the Port Gamble Mill/Bay cleanups. Josh has also organized community-wide programs to promote sustainability. Josh will work closely with Paul to achieve project goals while maintaining compliance with the Cooperative Agreement (CA).
- <u>Roma Call, Environmental Manager</u>: Roma has worked for PGST for over 9 years and strives to protect
  PGST's natural and cultural resources from the impacts of pollution, habitat degradation, and other
  threats. She holds a Master's in Public Administration/Env. Policy & NR from the University of
  Washington. Roma will assist Josh to ensure all technical/administrative grant requirements are met.
- <u>Bruce Youngberg, Tribal Accounting Manager</u>: Bruce has worked in PGST's Accounting Dept. for the past 8.5 years and assists with financial elements of PGST's many state/federal grants. Bruce will work with Josh to ensure the grant is properly managed and all financial requirements are met.
- <u>4.a.iii.</u> Acquiring Additional Resources: PGST has additional technical/support staff to assist with grant activities. PGST has proactive succession planning in the event that staff changes are required. Succession plans will eliminate project delays and ensure staff who are reassigned to the project have appropriate qualifications/experience. PGST routinely contracts with consultants and has established equal opportunity procedures for ensuring a fair bidding process. In 2019 PGST used a qualifications-based process in conformance with 2 CFR 200.317–200.326 to contract a qualified environmental professional (QEP). Advanced contractor procurement will position PGST for expedited implementation activities.
- 4.b. Past Performance: 4.b.i. Currently Has & Previously Received EPA Brownfield Grants: In addition to having successfully implemented Fiscal Year (FY) 2009 EPA Brownfield Community-Wide Assessment Grants for Hazardous Substances (\$200,000) and Petroleum (\$200,000), since 2008 PGST has received and effectively utilized a total of \$1,208,964 of annual EPA 128(a) Tribal Response Program (TRP) funding. Accomplishments and Compliance for the three (most recent) awards are provided in this section:
- (1) FY17 EPA Section 128(a) TRP | RP01J27302 | Total: \$90,000 | Term: 10/01/17–09/30/18 (closed).
- (2) FY18 EPA Section 128(a) TRP RP01J27303 Total: \$80,000 Term: 10/01/18-09/30/19 (pend. close).
- (3) FY19 EPA Section 128(a) TRP RP01J61601 Total: \$80,000 Term: 10/01/19-09/30/20 (open).
- 4.b.i.(1) Accomplishments: (1) FY17 EPA Section 128(a) TRP and (2) FY18 EPA Section 128 (a) TRP was primarily focused on supporting the following brownfield & related environmental restoration activities:
- Brownfield Inventory: Updated/enhanced list of priority sites and ongoing assessment/cleanup activity.
- <u>Major Cleanup/Restoration Efforts</u>: Active Participation in the Port Gamble Bay Natural Resources Damage Assessment (NRDA), Former Port Gamble Mill Upland Cleanup & Port Angeles NRDA projects.
- Sustainable Little Boston: Community group created to promote sustainability across the Reservation.
- Environmental Education: Classes to promote environmental education for the Tribal community.
- Debris Removal: A grant that was received to remove debris, a derelict vessel & pilings from Point Julia.
- Herring Sediment Study: A grant that was received for post-remediation monitoring of herring eggs.

Outputs: Brownfields Inventory; website updates; maintain and update Public Record; outreach materials; meeting materials (presentations/agendas/minutes); Quarterly Progress Reports (QPRs); Conference Report. Outcomes (to date): Enhanced Brownfield Inventory to prepare for additional assessment/cleanup activities; advanced major cleanup/restoration efforts within Port Gamble Bay; outreach successes; successfully implemented Point Julia debris removal & implemented Herring Study. (3) FY19 EPA Section 128(a) TRP: This funding was just received and will primarily focus on (1) Brownfield Inventory/Prioritization; (2) Oversight & Enforcement Authorities; (3) Public Participation; and (4) Cleanup Plans. Outputs/Outcomes: This project began on Oct. 1, and no outputs/outcomes have been completed. 4.b.i.(2) Compliance with Grant Requirements: PGST utilized all brownfield funding on time and achieved anticipated results. PGST maintained compliance with the terms and conditions of the work plans and Cooperative Agreements (CA), including the scope of work/schedule, site eligibility/uses of funding, and all reporting requirements. PGST has not had any adverse audit findings. Additional details for each grant: (1) and (2): All phases were successfully completed, and target outputs achieved within the one-year grant period. 100% of the budget was expended. (3): This project just started. All activities and 100% of the budget are anticipated to be completed within the allotted one-year grant implementation period.

# **ATTACHMENT A**

## **Threshold Criteria**

### **Threshold Criteria for Assessment Grants**

**1. APPLICANT ELIGIBILITY:** The Port Gamble S'Klallam Tribe (PGST) is a federally recognized Indian Tribe comprised of 1,313 members and is therefore eligible to receive EPA Brownfields Assessment Grant funding. Detailed eligibility information is provided below.

### (a) Eligibility of Lead Entity:

The Port Gamble Reservation was established by the United States Congress in 1936 and is located in Kingston, Washington. The Tribal lands consist of 1,822 acres, of which 1,765 acres are held in trust by the United States government for the benefit of the Tribe. There is no private land ownership on the Reservation. Most of the land is forested with residential, business and office areas. The Tribe has jurisdiction over activities occurring on the Reservation and has rights to economic and other benefits resulting from the use of the Tribe's property and resources.

In 1855, the S'Klallam signed the Treaty of Point No Point with the United States. The PGST Tribal government was reorganized under the Indian Reorganization Act in 1934. An elected Tribal Council of six members governs the Tribe. The Tribe operates under a Constitution approved by the United States federal government on September 7, 1939. In accordance with its Constitution, the Tribe enacts laws through resolutions of the Tribal Council. The services provided by the Tribe include general government, law enforcement and justice, education, natural resources management, community services, economic development, and a variety of social and health services. As such, the Port Gamble S'Klallam Tribe is an eligible applicant under the EPA Assessment Grant as specified in Section III.A of the FY20 Guidelines for Brownfield Assessment Grants.

#### 2. COMMUNITY INVOLVEMENT:

The project efforts in the hazardous and petroleum assessments will focus on optimal involvement and communications with Port Gamble S'Klallam Tribal (PGST) members and Tribal Council. The Tribe and their contractors will perform Public Involvement to ensure that community concerns are considered in planning and execution, and the public is kept informed of project progress and results. All Tribal members will be encouraged to attend occasional meetings to learn about the information, data and help generate initial concepts and ideas for future cleanup actions as well as community redevelopment and brownfield revitalization program approaches from a variety of methods including conducting community events, meetings, developing community relations strategies and preparing and distributing informational materials. PGST will use existing media sources including the weekly Tribal newsletter, PGST email accounts, and PGST's member Facebook account to communicate project information, solicit feedback, and to notice project meetings. PGST will host 2-3 public open houses over the course of the project to solicit input from Tribal Members regarding site prioritization and cleanup/reuse planning activities. PGST will host pop-up engagement stations at the Administrative Center, Wellness Center, Elders Center, Youth Center, or playgrounds, to capture feedback from full-time, busy parents and Tribal youth alike. PGST will create a Brownfields Advisory Committee (BAC) with Tribal member representatives to provide guidance on site assessment, cleanup, and reuse planning; the BAC will be advertised and open to the general membership.

### 3. EXPENDITURE OF ASSESSMENT GRANT FUNDS:

PGST does not have an active Assessment Grant at this time.

## **ATTACHMENT B**

## Port Gamble S'Klallam Tribal Council Resolution

THE

PORT GAMBLE

S'KLALLAM

TRIBAL COUNCIL

OF THE

PORT GAMBLE

S'KLALLAM TRIBE

I.

WHEREAS, the Port Gamble S'Klallam Tribe entered into the Treaty of Point No Point with the United States of America on January 26, 1855, reserving sovereign and aboriginal rights in perpetuity; and

II.

WHEREAS, the Port Gamble S'Klallam Reservation was proclaimed on June 16, 1938 to be an Indian reservation, held in trust by the federal government "...for the benefit and use of the Port Gamble Band of Clallam Indians...", under the provisions of Section 5 of the Indian Reorganization Act, the purchase of which was paid in full by Tribe; and

III.

WHEREAS, the Port Gamble S'Klallam Tribe's General Council delegated the Tribe's primary legislative authority to the Tribal Council under Article IV, Section 3 H of the Constitution of the Port Gamble S'Klallam Tribe, approved by the Secretary of Interior on July 7, 2007, **AMENDED BY CERTIFIED ELECTION JULY 8, 2013**; and

IV.

WHEREAS, the Port Gamble S'Klallam Tribe supports recovery, restoration, and preservation of its tribal land and all natural resources, including the marine ecosystem, and protection of both the environment and human health from the effects of pollution, contamination, and hazardous substances; and

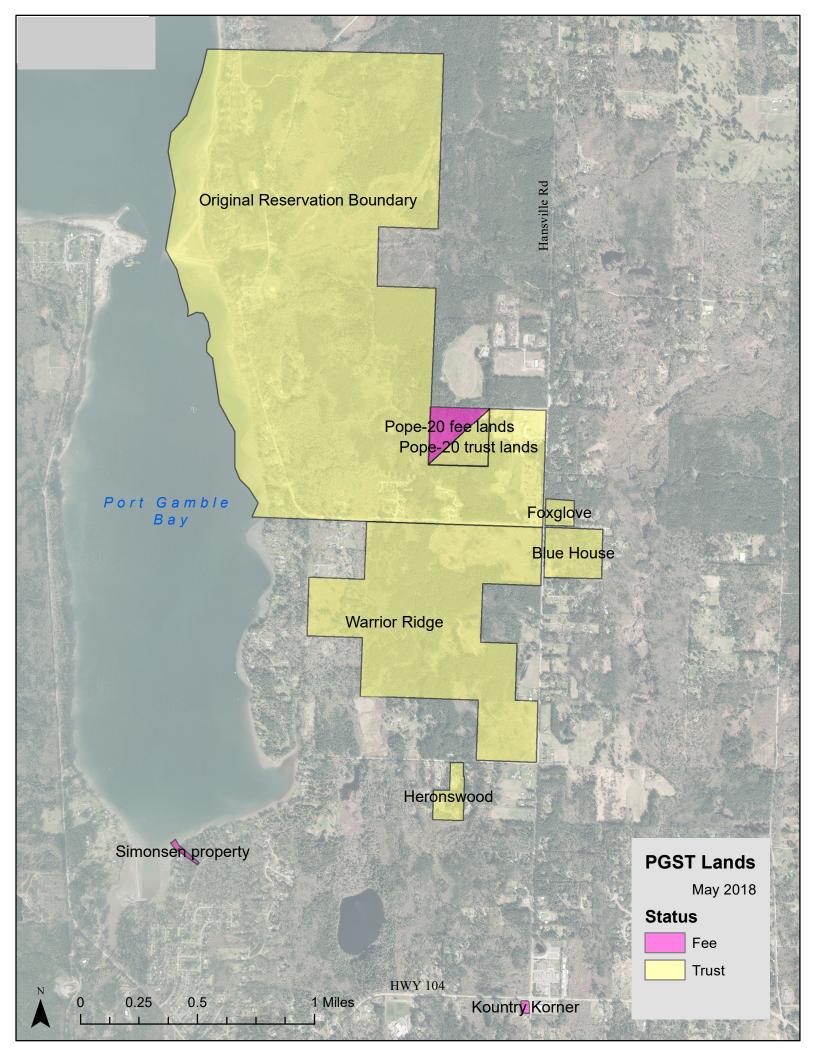
WHEREAS, the Port Gamble S'Klallam Tribe has charged the Natural Resources Department with responsibility for conducting or overseeing the assessment and cleanup of the brownfield sites identified on and around the Reservation, as well as securing the funding needed to carry out these activities.

VI.

NOW THEREFORE BE IT RESOLVED that the Tribal Council hereby authorizes the Natural Resources Department to apply for the Environmental Protection Agency's FY20 Brownfields Community Wide Assessment grant for funding.

## CERTIFICATION

CERTI	FICATION
WE HEREBY CERTION  special meeting held of the Port Gar S'Klallam Indian Reservation, at which time	FY that on this date there was a regular mble S'Klallam Tribal Council on the Port Gamble a quorum was present;
WE FURTHER CER' said meeting, introduced, evaluated, and was ABSTAIN dated this day of No	TIFY, that the above numbered resolution, was at passed by a vote of FOR, AGAINST vember, 2019.
Jeromy Syllivan	Jami Oil
Chairperson	Council Member



OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for	Application for Federal Assistance SF-424									
* 1. Type of Submis  Preapplication  Application  Changed/Cor	ion New				Revision, select appropher (Specify):	oriate letter(	(s):			
* 3. Date Received: 11/27/2019		4. Applicant Identifier:								
5a. Federal Entity Id	dentifier:			51	ib. Federal Award Ide	entifier:			]	
State Use Only:				1 -					J	
6. Date Received by	y State:		7. State Application	Iden	ntifier:					
8. APPLICANT INF	FORMATION:									
* a. Legal Name:	Port Gamble S'K	lallam	Tribe							
* b. Employer/Taxpa	ayer Identification Nur	mber (EIN	I/TIN):	- 1 -	c. Organizational DL	JNS:				
d. Address:										
* Street1: Street2:	31912 Little	Boston	Road Northeast	:						]
* City:	Kingston									
County/Parish:  * State:	Kitsap				WA: Washing	ton				
Province:					MIT WASHING					
* Country:					USA: UNITED S	TATES				
* Zip / Postal Code:	98346-9700									
e. Organizational	Unit:									
Department Name:				D	Division Name:					
Natural Resour	rces				Natural Resourc	ces				
f. Name and conta	act information of p	erson to	be contacted on m	atter	rs involving this ap	plication	:			
Prefix:			* First Nam	e:	Paul					
Middle Name:										
* Last Name: Mc	Collum									
Suffix:										
Title: Director, Natural Resources Department										
Organizational Affiliation:										
Port Gamble S'Klallam Tribe										
* Telephone Number: (360) 297-6288 Fax Number:										
* Email: paulm@p	*Email: paulm@pgst.nsn.us									

Application for Federal Assistance SF-424								
* 9. Type of Applicant 1: Select Applicant Type:								
I: Indian/Native American Tribal Government (Federally Recognized)								
Type of Applicant 2: Select Applicant Type:								
Type of Applicant 3: Select Applicant Type:								
* Other (specify):								
* 10. Name of Federal Agency:								
Environmental Protection Agency								
11. Catalog of Federal Domestic Assistance Number:								
66.818								
CFDA Title:								
Brownfields Assessment and Cleanup Cooperative Agreements								
* 12. Funding Opportunity Number:								
EPA-OLEM-OBLR-19-05								
*Title:  FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS								
FIZU GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS								
13. Competition Identification Number:								
Title:								
14. Areas Affected by Project (Cities, Counties, States, etc.):								
1234-PGSTLands_050418.pdf  Add Attachment  Delete Attachment  View Attachment								
* 15. Descriptive Title of Applicant's Project:								
Port Gamble S'Klallam Tribe - Brownfield Assessment Grant Program								
Attach supporting documents as specified in agency instructions.								
Add Attachments								

Application for Federal Assistance SF-424								
16. Congressional Districts Of:								
* a. Applicant	IA-006			* b. Program/Project WA-	006			
Attach an additional	list of Program/Project 0	Congressional Distric	ts if needed.					
			Add Attachment	Delete Attachment \	/iew Attachment			
17. Proposed Proje	ect:							
* a. Start Date: 10	/01/2020			* b. End Date: 09/	30/2023			
18. Estimated Fund	ding (\$):							
* a. Federal		300,000.00						
* b. Applicant		0.00						
* c. State		0.00						
* d. Local		0.00						
* e. Other		0.00						
* f. Program Income		0.00						
* g. TOTAL		300,000.00						
	Subject to Review B							
				er 12372 Process for review or				
-	subject to E.O. 12372 not covered by E.O. 12		elected by the State	or review.				
	Int Delinquent On Any	/ Federal Debt? (If	"res," provide exp	lanation in attachment.)				
	xplanation and attach							
ii 163 , provide 67	tpianation and attach		Add Attachment	Delete Attachment	/iew Attachment			
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)  ** I AGREE  ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.								
Authorized Repres	sentative:							
Prefix:		* Firs	st Name: Jeromy					
Middle Name:								
	livan							
Suffix:								
* Title: Chairman Chairman								
* Telephone Number: (360) 297-6243 Fax Number:								
*Email: jeromys@pgst.nsn.us								
* Signature of Authorized Representative: Dionne Deschenne * Date Signed: 11/27/2019								